

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

No. 21-CR-265 (S-1) (PKC) (CLP)

HU JI,
LI MINJUN,
TU LAN,
ZHU FENG,
 also known as “Johnny Zhu,”
MICHAEL MCMAHON,
ZHAI YONGQIANG,
ZHENG CONGYING and
ZHU YONG,
 also known as “Jason Zhu,”

Defendants.

-----X

DEFENDANT CONGYING ZHENG’S PROPOSED VOIR DIRE QUESTIONS

A. Concerning the prospective jurors and their households:

- (1) Name;
- (2) Place of birth;
- (3) Residential neighborhood(not street address) and length of time in that area;
- (4) Marital status;
- (5) Nature and extent of education;
- (6) Number and ages of children;
- (7) Name, age and relationship of members of prospective juror’s household;
- (8) Occupation and employment of the prospective juror, the juror’s spouse and children and members of the juror’s household;

- (9) Involvement as a party or a witness in a civil lawsuit or a criminal case;
- (10) Relationship, friendship or association with a law enforcement officer, a lawyer or any person affiliated with the courts;
- (11) Physical or mental condition affecting ability to serve on a jury;
- (12) Reasons the prospective juror believes he or she cannot or should not serve as a juror;
- (13) Relationship, friendship or association with the parties, the attorneys and prospective witnesses of the particular case to be heard.
- (14) Has the juror been victim of a crime? Will this affect the ability to be fair and impartial in this case?
- (15) Has the juror been victim of stalking or harassment, or know someone who has?
- (16) Have you previously served as a juror on a civil or criminal case?
 - a. If civil, do you understand that the burden of proof is higher in a criminal case, preponderance vs. beyond a reasonable doubt?
 - b. Did that jury reach a verdict?
- (17) Do you have any hobbies? What are they?

B. Concerning Specifics of this Case:

- (1) The law provides that you, as the trier of the facts may not make any inference because a defendant chooses not to testify
 - a. Do you feel a need to hear “both sides of the story” before you can make a decision on the facts?

- b. If a defendant does not testify, would you feel that he is trying to hide something?
- (2) Do you understand that it is the government that has the burden of proving the defendant's guilt beyond a reasonable doubt, and that the defendant has no obligation to provide any evidence or to prove anything?
- (3) You may notice the defendant will be using the services of an interpreter. Will that fact affect your ability to be fair and impartial in this matter?
- (4) Would you tend to give more (or less) weight to the testimony of someone in law enforcement over that of a civilian witness? Will you be able to hold any such witnesses to the same standard and any other witness?
- (5) What are your opinions regarding the diplomatic relationship between the United States and the People's Republic of China

Dated: Brooklyn, New York
May 1, 2023

Respectfully submitted,

s/ Renee M. Wong

Renee M. Wong, Esq.

Defense counsel (By ECF)